

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

TAM HOANG,  
Plaintiff,

V.

MICROSEMI CORPORATION and  
MICROCHIP TECHNOLOGY  
INCORPORATED,  
Defendants.

888 888 888

CIVIL ACTION NO: 4:19-cv-01971  
JURY DEMANDED

**PLAINTIFF TAM HOANG'S INTERROGATORY NO. 15**  
**TO DEFENDANT MICROSEMI CORPORATION**

TO: Defendant, Microsemi Corporation, by and through its attorneys of record, Carolyn Russell, Devin S. Vasquez, Ogletree, Deakins, Nash, Smoak & Stewart, P.C., One Allen Center, 500 Dallas Street, Suite 3000, Houston, Texas 77002 and Mark G. Kisicki, Ogletree, Deakins, Nash, Smoak & Stewart, P.C., 2415 E. Camelback Rd., Suite 800, Phoenix, Arizona 85016

These interrogatories are propounded by Plaintiff, Tam Hoang, to Defendant, Microsemi Corporation, and are to be answered by an officer or agent of the company, in accordance with the Federal Rules of Civil Procedure. Full and verified answers to these Interrogatories are to be served on Plaintiff at the offices of his attorney before the expiration of thirty (30) days from the date received.

Defendant is further hereby notified of its duty to amend its answers if Defendant obtains information upon the basis of which Defendant knows (a) that an answer was incorrect when made, or (b) that any answer, although correct when made, is no longer correct, true or complete.

Respectfully submitted,

JACKSON WALKER LLP

/s/ BROOKE A. LEONDAR

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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document will be forwarded via email in accordance with the Federal Rules of Civil Procedure on this the 19th day of May 2020, to the following:

Carolyn Russell, Esq.  
carolyn.russell@odnss.com  
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/s/ BROOKE A. LEONDAR

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BROOKE A. LEONDAR

## **DEFINITIONS AND ABBREVIATIONS**

Plaintiff sets forth the following definitions or abbreviations of various words and phrases, which are contained in the following Interrogatories. Plaintiff provides the following definitions or abbreviations for the purpose of clarifying the meaning of various words and phrases, *i.e.*, (a) to help Defendant fully and accurately understand the objectives of Plaintiff's discovery efforts and (b) to simplify and assist Defendant in its efforts to locate and furnish the relevant information.

A. "Defendant" or "Microsemi" shall refer to Defendant, Microsemi Corporation, its agents, assigns, subsidiaries, consultants, and all other persons at any time acting or purporting to act for or on its behalf.

"Microchip" shall refer to Defendant, Microchip Technology Incorporated, its agents, assigns, subsidiaries, consultants, and all other persons at any time acting or purporting to act for or on its behalf.

"Defendants" shall collectively refer to Defendants, Microsemi Corporation and Microchip Technology Incorporated, their agents, assigns, subsidiaries, consultants, and all other persons at any time acting or purporting to act for or on their behalf.

B. "Plaintiff" or "Hoang" shall refer to Plaintiff, Tam Hoang.

C. "Statements" shall mean any written or graphic statements signed or otherwise adopted or approved by the persons making it in any stenographic, mechanical, electrical or other recordings or a transcription thereof which is a substantial verbatim recital of an oral statement by the person making it and contemporaneously recorded.

D. "Document" shall mean writings of any kind, source and authorship both originals and all non-identical copies thereof in your possession, custody or control or known by you to exist. Regardless of whether the writing is one intended for or transmitted internally by you or intended for or transmitted to any other person or entity including without limitation any government agency, department, administrative entity or personnel. The terms shall include hand written, type written, printed, photocopied, photographic or recorded matter. It shall include communications in words, symbols, pictures, sound recordings, films, tapes and information stored in or accessible through computer or other information storage or retrieval systems together with the codes and/or programming instructions and other materials necessary to understand and use such systems. For purpose of illustration and not a limitation, the term shall include correspondence, transcriptions of testimony, letters, notes, reports, papers, files, books, records, contracts, agreements, telegrams, teletypes, and other communications sent or received, diaries, calendars, logs, notes, or memoranda, telephonic or face to face conversations, drafts, work papers, agendas, bulletins, notices, circulars, announcements, instructions, schedules, minutes, summaries, notes and other records or recordings of any conference meetings, visits, statements, interviews or telephone conversations, bills, statements, and other records of obligations and expenditures, canceled checks, vouchers, receipts, and other records of payments, ledgers, journals, balance sheets, profits and loss statements and other sources of financial data,

analysis statements, interviews, affidavits (including published books, articles, speeches and newspaper clippings); press releases, charts, drawings, specifications, manuals, brochures, parts lists, memoranda of all kinds to and from any persons, agencies or entities, technical and engineering reports, evaluations, advice, recommendations, commentaries, conclusions, studies, tests, plans, manuals, brochures, data reports, results in conclusions, records of administrative or technical or financial actions taken or recommended and all writings the contents of which relate to discuss, consider or otherwise refer to the subject matter of the particular discovery requested.

E. "Identify" when referring:

- 1) "to a person" means to state his or her full name and present or last known business and residential addresses and telephone numbers and email addresses.
- 2) "to a public or private corporation, partnership, association or other organization or to a governmental agency" means to state its full name, present or last known pertinent address, and telephone number.
- 3) "to a statement" means to identify who made it, who took or recorded it and all others, if any, present during the making thereof, to state when, where, and how it was taken or recorded, and to identify who has present or last known possession, custody, or control thereof.
- 4) "to other tangible thing" means to give a reasonable detailed description thereof, including, if applicable, when, where, and how it was made, to identify who made it, and to identify who has present or last known possession, custody, or control thereof.
- 5) "to an insurance agreement" means to list the policyholder, all additional insured, the policy number, the insurance company carrying the policy, its anniversary dates, the policy limits of the policy, and the policy number.

#### **PRIVILEGED INFORMATION**

In the event that any information requested is claimed by you to be privileged, state in the response (or an amended or supplemental response) (1) that information or material responsive to the request has been withheld; (2) the request to which the information or material relates; and (3) the privilege or privileges asserted.

#### **FACTUAL BASIS**

Interrogatories which request a description of the factual basis in support of certain claims do not request, and should not be construed to request, the responding party to marshal all of the available proof or all of the proof the party intends to offer at trial.

**INTERROGATORIES**

Please answer the following:

15. Provide the following information for all Microsemi employees who reported, either directly or indirectly, to David Sheffield for any period of time during 2017 or 2018.

- a. Name;
- b. Date of birth;
- c. Race;
- d. National origin;
- e. Date of hire;
- f. Date of termination;
- g. Reason for termination (indicate “RIF” or “other”);
- h. Job function;
- i. Education; and
- j. Ongoing work and projects as of January 23, 2018.

**ANSWER:**

## **EXHIBIT B**

